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From: <david.geesin@acsalaska.net>
To: Michael Copps <mcopps@fcc.gov>
Date: 8/16/02 4:16PM
Subject: Dish/Direct Merger

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Dear Commissioner Copps,

I am a career broadcaster of some 38 years from the State of Alaska. My career spans radio and television, both commercial and public.

During your recent visit you encouraged us to comment on a variety of issues, including the proposed merger of Dish and Direct. I would like to do so.

Let me first go on record as being in favor of the merger.

To my mind, the benefits greatly outweigh the potential drawbacks.

Here are my thoughts:

First, I see the direct to home broadcast services as a competitor to the cable industry. Cable needs a strong competitor. Disallowing the merger will leave two services, each much too weak to be a truly effective competitor with cable on a national scale.

Second, I really do believe that one company can and will make much more effective use of the available satellite capacity to deliver services. Two services competing for viewers will not reach all markets with all channels because they will just run out of capacity in the sky or the return on investment for service to small markets will just not reach any reasonable level to warrant going forward with service. A single stronger company will extend itself more than they will as separate individual organizations. Leaving them both out there will certainly limit the number of local television stations that will be delivered by the direct to home satellite services. Every market they would compete in means each station in that market consumes twice the satellite capacity, limiting the likelihood other stations will get the opportunity to be up in the sky. States like Alaska, whose largest market is only 155 or so would under these conditions never be able to realistically expect to get any in state broadcaster delivered by satellite. For largely rural states like ours, that would be a double whammy. Most communities in our state depend on satellite delivered programming. Our in state broadcasters need the assurance that they, and others like them, will be allowed a level playing field. Our rural viewers would like something besides Seattle to view.

Third, The NRTC is missing the point. The viability of any service of this type is about making it possible for them to be very competitive in urban America and insuring that the same services are available to rural America at the levels. Insisting on competition for rural viewers simply misses the point. Direct to home should and needs to be in competition with cable not each other.

Now, the devils are always in the details but approving the merger with all speed is the appropriate thing to do. Extract the promises that rural viewers in all 50 states will receive identical opportunities for

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service as the urban viewers.

With the merger approved, I believe all the Nielsen markets will get local to local and our urban viewers will have much to pick from. Cable will have knocking at its door a really stronger competitor.

I see this as the proverbial "win win" situation.

Thank you for your time.

Sincerely

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